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VIRGINIA E. VIDA **EXECUTIVE DIRECTOR**

DATE: September 5, 2002

TO: Members, Fair Political Practices Commission

Ginny Vida, Executive Director 9. 0. FROM:

RE: Potential Program Cuts

I have reviewed the proposed budget cuts identified by Chairman Karen Getman and Executive Director Mark Krausse in their memorandum dated August 26, 2002. While I recognize that the Commission must make some difficult choices, I write to express my particular concern with reductions in the budget for the advice and educational functions. Of all of the cuts identified, I believe that these will have the greatest impact upon my staff's ability to perform its functions, as well as upon our mutual goal of ensuring compliance with the Political Reform Act.

While many of the programs you identified as potential targets for budget reductions are valuable, and their elimination will have some impact upon our local agency, the advice and education functions may be the most significant. The FPPC's telephone advice and written advice provide critical assistance to members of the regulated community in complying with the law. Each advice letter educates not only the person who requested the advice, but many other individuals who confront similar situations. Our local ethics agency cannot substitute for the FPPC in providing these resources. Only the FPPC can provide binding interpretations of the often complex provisions of the Political Reform Act and its implementing regulations. Our staff frequently refers inquiries about state law to the FPPC or consults the FPPC before providing advice.

Our staff also relies on the FPPC to guide it in fulfilling its obligations as a filing officer and administrator of the campaign finance provisions of the Act. Without ready access to the advice and guidance of the FPPC, our office will have a more difficult time performing this function.

The FPPC's training programs for filing officers and campaign treasurers serve similarly valuable purposes. While we agree that there may be more cost-effective ways of providing these programs, we think eliminating them altogether would undermine compliance with the law.

While some of the other proposed cuts would affect our local agency, by increasing our workload to some degree, the FPPC advice and educational functions are essential to ensuring greater compliance with the Political Reform Act. Dollars spent on these programs are good investments because they help avoid violations of the Act, which is the ultimate goal of both of our agencies.

If you have any questions, please feel free to call me at (415) 581-2300.

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